Remarks

This Application has been carefully reviewed in light of the Office Action mailed August 8, 2008. Applicants appreciate the Examiner's consideration of the Application. Applicants believe all claims are allowable without amendment and respectfully provide the following remarks. Applicants respectfully request reconsideration and allowance of all pending claims.

I.   The Claims are Allowable over the Proposed *Bau-Merrells* Combination

Claims 1-12 are rejected under 35 U.S.C. § 103 (a) as being unpatentable over U.S. Patent Publication No. 2003/0023957 by Bau, III et al. (*"Bau"*) in view of U.S. Patent 7,016,976 to Merrells et al. (*"Merrells"*). Applicants respectfully traverse this rejection.

Claim 1 is directed to a method of generating keys for object(s) in a Web Services arrangement. At least one object based on at least one of a plurality of Universal Description, Discovery and Integration (UDDI) objects is stored as an entry in a directory. The directory includes a hierarchical organization of a plurality of entries. Each of the plurality of entries has a plurality of attributes. It is determined if the at least one object has a defined first key. If the at least one object has a defined first key, the defined first key is provided for the at least one object as a naming attribute for the entry corresponding to the at least one object in the directory. The defined first key uniquely identifies the entry in the directory. If the at least one object does not have a defined first key, a second key for the at least one object is provided as the naming attribute for the entry corresponding to the at least one object in the directory. The second key uniquely identifies the entry in the directory. The cited references do not teach or suggest each of the limitations.

For example, the cited references fail to teach or suggest "storing at least one object based on at least one of a plurality of Universal Description, Discovery and Integration (UDDI) objects as an entry in a directory." The Office Action concedes that *Bau* does not disclose this limitation. *See* Office Action, Page 4. Instead, the Office Action argues that Column 3, line 56 - Column 14, line 3 of *Merrells* discloses this limitation. *See* Office

Action, Page 4. Applicants respectfully submit that this rejection is improper for at least two reasons. First, Applicants note that the Office Action cites portions of *Merrells* that do not exist. *Merrells* does not include a Column 14 and ends at Column 12. Thus, Applicants are forced to speculate as to which portion(s) of *Merrells* the Office Action intended to cite. Second, even assuming for the sake of argument only that the Office Action intends to cite the entirety of *Merrells* in rejecting this limitation, the entirety of *Merrells* still fails to teach or suggest this limitation. In rejecting this limitation, the Office Action contends that *Merrells* discloses "an LDAP client (100) that searches a directory for a specific entry." *See* Office Action, Page 4. Even assuming for the sake of argument only that *Merrells* discloses searching a directory (which Applicants do not concede), searching a directory in no way teaches or suggests **storing an object based on a Universal Description, Discovery and Integration (UDDI) object** as an entry in a directory. Therefore, at least the cited portion of *Merrells* fails to teach or suggest "storing at least one object based on at least one of a plurality of Universal Description, Discovery and Integration (UDDI) objects as an entry in a directory." The Office Action does not allege that *Bau* cures this deficiency; in fact, the Examiner acknowledges that *Bau* does not disclose this limitation of Claim 1.

Furthermore, Applicants do not admit that the proposed combination is possible or that the Office Action provided an adequate reason for combining or modifying the references in the manner proposed by the Office Action.

Claim 6 also includes limitations generally directed to storing at least one object based on at least one of a plurality of Universal Description, Discovery and Integration (UDDI) objects as an entry in a directory. For at least those reasons discussed above with regard to Claim 1, Applicants respectfully contend that the cited references do not teach or suggest the limitations of Claim 6.

For at least these reasons, Applicants respectfully submit that Claims 1 and 6 are patentably distinguishable from the cited references and respectfully request reconsideration and allowance of independent Claims 1 and 6 and their dependent claims.

II.   <u>No Waiver</u>

All of Applicants' arguments are without prejudice or disclaimer. Additionally, Applicants have merely discussed example distinctions from the references cited by the Examiner. Other distinctions may exist, and Applicants reserve the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner's additional statements. The example distinctions discussed by Applicants are sufficient to overcome the Examiner's rejections.
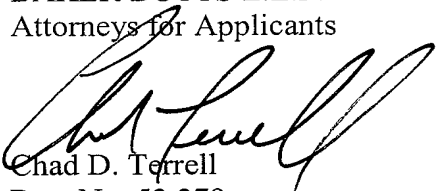
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Conclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Chad D. Terrell, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6813.

Although Applicants believe no fees are due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to **Deposit Account No. 02-0384 of Baker Botts L.L.P.**

Respectfully submitted,

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